

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RYAN R. KRUEGER, Derivatively on behalf
of Nominal Defendant PERRIGO COMPANY
PLC,

Plaintiff,

v.

BRADLEY A. ALFORD, *et al.*,

Defendants,

PERRIGO COMPANY PLC,

Nominal Defendant.

C.A. NO. 2:19-CV-18652-MCA-LDW

ECF Case

Document Electronically Filed

STIPULATION AND [PROPOSED] ORDER

Plaintiff Ryan R. Krueger (“Plaintiff”) and Defendants Bradley A. Alford, Rolf A. Classon, Adriana Karaboutis, Jeffrey B. Kindler, Donal O’Connor, Geoffrey M. Parker, Theodore R. Samuels, Jeffrey C. Smith, Laurie Brlas, Gary M. Cohen, Jacquelyn A. Fouse, Ellen R. Hoffing, Michael J. Jandernoa, Gerald K. Kunkle, Jr., Herman Morris, Jr., Murray S. Kessler, John T. Hendrickson, Joseph C. Papa, Judy L. Brown, Ronald L. Winowiecki, Douglas S. Boothe, and Marc Coucke (collectively, the “Individual Defendants”) and Perrigo Company plc (together with the Individual Defendants, “Defendants”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, in accordance with the deadlines set forth in the Joint Stipulation ordered by the Court on December 13, 2019 (ECF No. 17), the deadline for Defendants’ reply briefs in further support of their motions to dismiss is April 17, 2020;

WHEREAS, in response to the severity and spread of the coronavirus (COVID-19), the Governor of New Jersey has declared a State of Emergency and a Public Health Emergency and the President of the United States has declared a Federal State of Emergency;

WHEREAS, the United States District Court for the District of New Jersey has issued a number of standing orders (*see e.g.* Standing Order 20-02: Court Operations Under the Exigent Circumstances Created by COVID-19 (“Standing Order 20-02”) and Standing Order 20-03: Additional Measures Due to the Exigent Circumstances Created by COVID-19 on March 16, 2020), which outline various changes to court operations due to the current COVID-19 pandemic;

WHEREAS, the exigent circumstances created by the COVID-19 have caused substantial delays to normal work practices and communications;

WHEREAS, “judicial officers may apply the principles of flexibility and accommodation to reasonable requests for filing or scheduling adjustments” (Standing Order 20-02);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their undersigned counsel, that Defendants’ deadline for their reply briefs in further support of their motions to dismiss shall be extended until May 29, 2020.

Respectfully submitted,

DATED: March 24, 2020

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SO ORDERED

Date:

Madeline Cox Arleo
United States District Judge